

MOLLIE HARTMAN LUSTIG (NJ ID 000862011)
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Attorneys for Plaintiff Amaran. Abdoul Aziz Wereme

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

AMARAN. ABDOUL AZIZ WEREME, on
behalf of himself and all others
similarly situated,

Plaintiff,

v.

AMERICAN EAGLE EXPRESS, INC.
d/b/a AEX Group,

Defendant.

CIVIL ACTION

No.: 2:20-cv-05616-ES-MAH

**NOTICE OF VOLUNTARY DISMISSAL
OF COMPLAINT AGAINST AMERICAN
EAGLE EXPRESS, INC. D/B/A AEX
GROUP PURSUANT TO RULE
41(a)(1) BY AMARAN. ABDOUL
AZIZ WEREME**

Plaintiff Amaran. Abdoul Aziz Wereme hereby gives notice of his voluntary dismissal without prejudice of American Eagle Express, Inc. d/b/a AEX Group ("AEX"), pursuant to Rule 41(a)(1) of the Federal Rules of Civil Procedure in the matter docketed Civ. No. 2:20-cv-05616-ES-MAH ("the Wereme Matter"). Defendant AEX has not filed an answer or motion for dismissal as of this time. Defendant AEX consents to this dismissal.

Plaintiff Wereme is similarly situated to the proposed class of plaintiffs in the action entitled Ever Bedoya et al. v. American Eagle Express, Inc. d/b/a AEX Group ("the Bedoya Matter" or "Bedoya Class") and docketed as Civil Action No. 2:14-cv-02811(ES)(JAD). Plaintiff Wereme's wage and hour claims are identical to those of the proposed members of the Bedoya class and his interests will be adequately protected as a member of the Bedoya class, if and when the class is certified. Plaintiffs in the Bedoya Matter filed a motion to dismiss, seeking to have the Wereme Matter dismissed. The plaintiffs in the Bedoya Matter also consent to this voluntary dismissal without prejudice.

Plaintiff Wereme's Motion to Consolidate Pursuant to Federal Rules of Civil Procedure 42(a) and Appoint Chasan Lamparello Mallon & Cappuzzo as Interim Co-Lead Counsel Pursuant to Federal Rules of Civil Procedure 23(g) (Doc. 151) shall also be withdrawn.

In support of this notice Plaintiff relies on Rule 41(a)(1) of the Federal Rules of Civil Procedure and the attached Declaration of Mollie Hartman Lustig.

Respectfully submitted,

By: /s/ Mollie Hartman Lustig
Mollie Hartman Lustig

Dated: December 18, 2020

ON NOTICE TO: R. Andrew Santillo, Esq.
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Attorneys for Plaintiff Ever Bedoya, et al. in
the 2:14-cv-02811-ES-JAD action

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Inc., d/b/a AEX Group in the 2:20-cv-05616-ES-MAH
and 2:14-cv-02811-ES-JAD actions